

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TERRANCE JOHNSON, et al.,

## Plaintiffs.

vs.

CARPENTERS OF WESTERN  
WASHINGTON BOARD OF TRUSTEES, et  
al.,

## Defendants

NO. 2:22-cv-01079-JCC

**STIPULATED MOTION TO EXTEND  
TIME ON DEADLINE FOR BOARD  
DEFENDANTS TO FILE REPLY IN  
SUPPORT OF MOTION TO DISMISS  
AND TO EXTEND CONSIDERATION  
DATE AND PROPOSED ORDER**

**NOTED FOR MOTION ON:  
MARCH 2, 2023**

STIPULATED MOTION  
TO EXTEND TIME - 1  
NO. 2:22-cv-01079-JCC

**GORDON REES SCULLY  
MANSUKHANI, LLP**  
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1 Defendants Carpenters of Western Washington Board of Trustees, Gerald Auvil, Noe  
2 Castillo, Ken Ervin, Jeff Foushee, Kurt Hildebrand, Steve Hoffmann, Martin Holberg, Dan  
3 Hutchins, Ryan Hyke, Andrew Ledbetter, Ron Montoya, Tim O'Neill, Jim Osborne, Doug  
4 Peterson, Rick Poitras, Danny Robins, Evelyn Shapiro, Bob Susee, Jeff Thorson, Doug Tweedy,  
5 and Wilf Wainhouse (collectively, the “Board Defendants”), and Plaintiffs Terrance Johnson,  
6 Brent Yahraus, and Jacy Purkiss, by and through their undersigned counsel, stipulate to extend  
7 the due date for the Board Defendants’ Reply in support of their Motion to Dismiss from March  
8 7, 2023 to March 21, 2023, and to extend the date of the Court’s consideration of said Motion  
9 from March 10, 2023 to March 24, 2023.

10 WHEREAS, on December 1, 2022, this Court entered its Minute Order setting the  
11 briefing schedules for Defendants’ Motions to Dismiss. *See* Dkt. No. 110 (“Defendants’ Replies  
12 in Support of Their Motions to Dismiss (if any) are due March 7, 2023.”).

13 WHEREAS, Counsel for Board Defendants are experiencing a “true, unforeseen  
14 emergency” regarding health and safety issues relating to COVID-19.

15 WHEREAS, on February 28, 2023, counsel for Board Defendants and Plaintiffs  
16 conferred and agreed to extend the deadline on Board Defendants’ Reply and the Court’s  
17 consideration of said Motion in light of Board Defendants’ counsels’ health and safety issues  
18 relating to COVID-19. *See* LCR 7(j).

19 WHEREAS, this requested extension of time will not affect any other deadlines in this  
20 case.

21 NOW THEREFORE, the Parties respectfully request that the Court extend the due date  
22 for the Board Defendants’ Reply in support of their Motion to Dismiss from March 7, 2023 to  
23 March 21, 2023, and to extend the date of the Court’s consideration of said Motion from March  
24 10, 2023 to March 24, 2023.

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STIPULATED MOTION  
TO EXTEND TIME - 2  
NO. 2:22-cv-01079-JCC

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1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 2nd day of  
2 March, 2023.

3 ENGSTROM LEE MCDONOUGH  
4 THOMPSON & THOMSON LLC

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11 *Counsel for Plaintiffs Terrance Johnson, Brent  
12 Yahraus, and Jacy Purkiss, individually and as  
13 the representatives of a class of similarly  
14 situated persons, and on behalf of the  
15 Carpenters of Western Washington Individual  
16 Account Pension Plan and the Carpenters  
17 Retirement Plan of Western Washington*

18 GORDON REES SCULLY  
19 MANSUKHANI, LLP

20 By: /s/ Sarah N. Turner  
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26 AND

GROOM LAW GROUP, CHARTERED

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STIPULATED MOTION  
TO EXTEND TIME - 3  
NO. 2:22-cv-01079-JCC

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Andrew Ledbetter, Ron Montoya, Tim  
O'Neill, Jimmy Osborne, Doug Peterson,  
Rick Poitras, Danny Robins, Evelyn Shapiro-  
O'Connor, Bob Susee, Jeff Thorson, Doug  
Tweedy, and Wilf Wainhouse*

11  
12 **[PROPOSED] ORDER**  
13

14 Based on the foregoing stipulated motion of the parties, therefore, IT IS HEREBY  
15 ORDERED THAT the due date for the Board Defendants' Reply in support of their Motion to  
16 Dismiss is extended from March 7, 2023 to March 21, 2023, and the date of the Court's  
consideration of said Motion is extended from March 10, 2023 to March 24, 2023.  
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18 IT IS SO ORDERED.  
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DATED this 3rd day of March 2023.  
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The Honorable John C. Coughenour  
United States Senior District Judge

STIPULATED MOTION  
TO EXTEND TIME - 4  
NO. 2:22-cv-01079-JCC

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